

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
No. 25-cv-22896-KMW**

FRIENDS OF THE EVERGLADES, INC., et al.,

Plaintiffs,

v.

KRISTI NOEM, et al.,

Defendants.

DEFENDANT FDEM'S CORRECTED NOTICE OF SUPPLEMENTAL AUTHORITY

Defendant FDEM respectfully submits this corrected notice of supplemental authority containing a declaration from Ian Gadea-Guidicelli. The declaration explains that Plaintiffs have misunderstood (and incorrectly broadened) the area that FDEM has used to build and operate the detention facility. It also provides a new map to account for fencing at security checkpoints leading into the airport site. As the declaration explains, because those security checkpoints exist entirely in Collier County, including them in the calculation would decrease the percentage of utilized land in Miami-Dade from 2.2% to 2.02%.

Dated: August 3, 2025

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Respectfully submitted,

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capacity as Executive Director of the Florida
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CERTIFICATE OF SERVICE

I hereby certify that on August 3, 2025, the foregoing was filed with the Clerk of Court using CM/ECF, which will serve a Notice of Electronic Filing on all counsel of record.

s/ Jesse Panuccio
Jesse Panuccio